

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: SUNEDISON, INC. SECURITIES
LITIGATION

Civil Action No. 1:16-md-2742-PKC

This Document Relates To:

Horowitz et al. v. SunEdison, Inc. et al.,
Case No. 1:16-cv-07917-PKC

**NOTICE OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT AND
APPROVAL OF DISSEMINATION OF NOTICE OF SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated July 11, 2019 (the “Stipulation”), attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiff the Municipal Employees’ Retirement System of Michigan and Named Plaintiff Arkansas Teacher Retirement System hereby move this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses.¹ The Parties’ agreed-upon proposed Order Preliminarily Approving Settlement and Providing for Settlement Notice is submitted herewith. Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

¹ All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

Dated: July 12, 2019

Respectfully submitted,

/s/ Salvatore J. Graziano
**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**
Salvatore J. Graziano
Katherine M. Sinderson
Adam Hollander
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 554-1400
Fax: (212) 554-1444
Email: salvatore@blbglaw.com
katiem@blbglaw.com
adam.hollander@blbglaw.com

***Lead Counsel for Lead Plaintiff and the
Class***

#1305357